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DEPARTMENT OF JUSTICE

JUL 25 9 22 AH '79

UNITED STATES DEPARTMENT OF JUSTICENTERNAL SECURITY: WASHINGTON, D.C. 20530 REGISTRATION UNIT. BECTION CRIMINAL DIVISION

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents Registration Act of 1938, as Amended

For Six Month Period En	JUN	4 1979	
		(Insert date)	
Name of Registrant		Registration No.	
ARNOLD & PORTER		,	
Business Address of Registrant			
1229 Nineteenth Street, N.W. Washington, D. C. 20036	REGISTRANT		
1. Has there been a change in the information pre	viously furnis	hed in connection with the f	ollowing:
(a) If an individual: N.A.			•
1.1	Yes Yes Yes Yes	No No No No No No No No	
(b) If an organization:			
(2) Ownership or control	Yes Yes Yes Yes	No X No X No X	
2. Explain fully all changes, if any, indicated in	Item 1.		
N.A.			
IF THE REGISTRANT IS AN INDIVID	DUAL, OMIT F	RESPONSE TO ITEMS 3, 4,	and 5.
3. Have any persons ceased acting as partners, of this 6 month reporting period? Yes X	fficers, direct	ors or similar officials of the	e registrant during
If yes, furnish the following information:			
Name	Position		Date Connection
Andrew Krulwich	Partner		<i>Ended</i> 1/8/79
Irvin Nathan	Partner		1/28/79

4. Have any persons beco period? XYes	me partners, officers, o	directors or si	milar officials	during this 6	month reporting
If yes, furnish the follo	owing information:				•
Name	Residence Address	•	Citizenship	Position	Date Assumed
See Attachment No	o. 1				
5. Has any person named principal? Yes [X		ices directly i	n furtherance o	of the interest	s of any foreign
Cary H. Sher filed short form r principals. Steven P. Lo render services to	ockman, who became o foreign principa	wis and Tho ments, have a partner ils during t	e rendered a during an a his period	services to earlier per	riod, began to
6. Have any employees of terminated their employ Yes No [X]	ment or connection with				
If yes, furnish the follo	owing information:				
Name	Position o	or connection			Date terminated
	lered services to the reg a clerical or secretaria	gistrant directly	in furtherance	of the interes	other capacity by sts of any foreign
If yes, furnish the follo	owing information:				
Name	Residence Address	-	osition or connection		Date connection began
	following persons, oreign principals			gan to rend	der services
Paul S. Reichler	2032 Belmont Rd Washington, D.		Asso	ciate	August 20, 1973
Phyllis J. Cohen	2339 Ashmead Pl Washington, D.	•	Asso	ciate	September 18, 197
Thomas J. Milch	1728 New Hampsh Washington, D.		N.W. Assoc	ciate	January 3, 1977
Scott H. Lang	3816 Windom Pla Washington, D.		Assoc	ciate	September 5, 1978
John M. Quinn	1706 - 37th Str Washington, D.		Asso	ciate	September 28, 197
Paul C. Beso	9722 Culver Str Kensington, Md.		Asso	ciate	January 3, 1977

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this Yes No X	o month reporting period.
If yes, furnish the following information:	
Name of foreign principal	Date of Termination
9. Have you acquired any new foreign principal during this 6 month	n reporting period? Yes X No
If yes, furnish following information:	
Name and address of foreign principal	Date acquired
See Attachment No. 2	
10. In addition to those named in Items 8 and 9, if any, list the fore represent during the 6 month reporting period.	eign principals ¹ whom you continued to
See Attachment No. 3	
III - ACTIVITIES	
11. During this 6 month reporting period, have you engaged in any ac any foreign principal named in Items 8, 9, and 10 of this statemen	ctivities for or rendered any services to
If yes, identify each such foreign principal and describe in full d	letail your activities and services:
See Attachment No. 4	

The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

ity as defi	o month reporting perior ned below?	d, nave you on benai	it of any foreign princi	par engaged in poir	ilcal activ-
Yes X	No				
ing, among ployed to ac	tify each such foreign pother things, the relation thieve this purpose. If V broadcasts, give details	ns, interests and po the registrant arran	licies sought to be ged, sponsored or d	influenced and the elivered speeches,	means em- lectures or
See Att	achment No. 5				
				·	
				·	
-					· · · · ·
	to the above described a or all of your foreign p		ve you engaged in act.	ivity on your own be	half which
Yes 🗌	No X				
If yes, desc	ribe fully.		4	• ,	
					* .
	•			•	

The term "political activities" means the dissemination of political propagands and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a)	RECEIPTS - MONIES											
	During this 6 month repo	rting period,	have you	received	from	any i	foreign	principal	name	d in	Items	8,
		_										

and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes X

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.3

Date

From Whom

Purpose

Amount

See Attachment No. 6

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value 4 other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes [

No X

If yes, furnish the following information:

Name of foreign principal

Date received Description of thing of value

Purpose

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

			-6-	
15 (a)	DISBURSEMENTS -	MONIES		
27. (4)	During this 6 month (1) disbursed or ex	reporting period, have y	ou tion with activity on beha Yes [X] No	alf of any foreign principal named
		ies to any such foreign p		No X
	If yes, set forth bel monies, including n	low in the required detail nonies transmitted, if any	and separately for each for, to each foreign princip	oreign principal an account of such al.
	Date	To Whom	Purpose	Amount
	See Attachme	nt No. 7		
				Total

	furtherance of	of month reporting period of or in connection with is statement?	, have you disposed of activities on behalf of	f anything of value? any foreign principal	other than mone named in items	8, 9
	Yes 🗌	No X	,		•	
	If yes, furni	sh the following informa	tion:			
	Date disposed	Name of person to whom given	On bebalf of what foreign principal	Description of thing of value	Purl	pose
(c)	During this directly or to	ENTS - POLITICAL CO 6 month reporting period hrough any other person with an election to any p caucus held to select ca	, have you from your o , made any contribution political office, or in co	is of money or other connection with any page	things of value	2 in
(c)	During this directly or to connection wention, or o	6 month reporting period hrough any other person	, have you from your of , made any contribution solitical office, or in condidates for political of	is of money or other connection with any page	things of value rimary election,	2 in
(c)	During this directly or to connection wention, or o	6 month reporting period hrough any other person with an election to any p caucus held to select ca	, have you from your of made any contribution colitical office, or in condidates for political contion: Nan political	is of money or other connection with any page	things of value rimary election,	? in

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16.	During this 6 month reporting period,	did you prepare	disseminate	or cause	to be	disseminated	any	polit-
	ical propaganda as defined above?	Yes X	No 🗀					

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

London Commodity Exchange Co., Ltd.; International Commodities Clearing House, Ltd.; Union Nacional de Productores de Hortalizas

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18.	During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes No X
	If yes, identify each such foreign principal, specify amount, and indicate for what period of time.
	The state of the s
19,	During this 6 month reporting period, did your activities in preparing, disseminating or causing the disemination of political propaganda include the use of any of the following: Radio or TV broadcasts X Magazine or newspaper Motion picture films X Letters or telegrams articles
	Advertising campaigns Press releases Pamphlets or other Lectures or publications speeches
	X Other (specify) Memoranda; Congressional Testimony
20.	During this 6 month reporting period, did you disseminate or cause to be disseminated political propa-
	ganda among any of the following groups: X Public Officials X Newspapers Libraries
	Legislators Educational institutions
	☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
	[X] Other (Specify) foreign diplomats; public relations firm; press services
21	Of associations; lawyer What language was used in this political propaganda:
21.	X English
33	Did you file with the Registration Section, Department of Justice, two copies of each item of political prop-
24,	aganda material disseminated or caused to be disseminated during this 6 month reporting period?
	Yes X No
	Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes X No
24.	Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?
	Yes X No
	VI - EXHIBITS AND ATTACHMENTS
25.	EXHIBITS A AND B
	(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:
	Exhibit A ⁶ Yes X No
	Exhibit B ⁷ Yes X No
	If no, please attach the required exhibit.
	(a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?
	Yes No X
	If yes, have you filed an amendment to these exhibits? Yes No No N.A.
	If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

7 The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

20,	EXHIBIT C
٠	If you have previously filed an Exhibit C ⁸ , state whether any changes therein have occurred during this 6 month reporting period.
	Yes No N.A.
	If yes, have you filed an amendment to the Exhibit C? Yes . No . N.A.
	If no, please attach the required amendment.
27.	SHORT FORM REGISTRATION STATEMENT
	Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes X No No
	If no, list names of persons who have not filed the required statement.
==	
that cep in a his befo oath jorit simi	ation statement and the attached exhibits and that he is (they are) familiar with the contents thereof and such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, ext that the undersigned make(s) no representation as to the truth or accuracy of the information contained ttached Short Form Registration Statement, if any, insofar as such information is not within his (their) (their) personal knowledge. (Type or print name under each signature) (Both copies of this statement shall be signed and sworn to re a notary public or other person authorized to administer s by the agent, if the registrant is an individual, or by a may of those partners, officers, directors or persons performing lar functions who are in the United States, if the registrant
is a	n organization.)
	Subscribed and sworn to before me at Maslington D.C.
	25 01.
this	
	fatrecia D'Accis
	(Signature of notary or other officer)
٠.	My Commission Expires October 31, 1979

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes x No ____

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
Cary H. Sherman	5414 Blackistone Rd. Bethesda, Md. 20016	United States	Partner	1/1/79
Daniel M. Lewis	6204 Welborn Drive Bethesda, Md. 20016	United States	Partner	1/1/79
Thomas B. Wilner	3745 Huntington St., N.W. Washington, D. C. 20015	. United States	Partner	1/1/79

1

9. Have you acquired any new foreign principal during this 6 month reporting period?
Yes x No ____

If yes, furnish following information:

Name and address of foreign principal	Date acquired
Embassy of the Government of Israel 1621 22nd Street, N.W. Washington, D. C. 20008	2/27/79
Kawasaki Heavy Industries, Ltd. 4-1, 2 Chome Hamamatsu-Cho Minato-Ku Tokyo, Japan	11/28/78 <u>*</u> /
Asociacion de Fabricantes de Productores Quimicos Edf. Fedecamaras Piso 4 Ave. El Embalme Urb. El Bosque Caracas, Venezuela	4/16/79
Government of the Republic of Panama Ministry of Foreign Relations Panama City, Republic of Panama	4/23/79

The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

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*/ Representation of this foreign principal was limited to legal representation before an agency of the Government of the United States in the course of established agency proceedings.

10. In addition to those named in Items 8 and 9, if any, list the foreign principals whom you continued to represent during the 6 month reporting period.

Association Francaise des Banques

Ambassador of the Swiss Confederation

Swiss Cheese Union, Inc.

Switzerland Gruyere Processed Cheese Manufacturers' Association

Federation Suisse des Associations de Fabricants d'Horlogerie

Union Nacional de Productores de Hortalizas

International Commodities Clearing House, Ltd.

London Commodity Exchange Co., Ltd.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement?

Yes x No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning international trade, imports of and statistics on watches, multilateral trade negotiations, tariff simplification, Harmonized Commodity Code, U.S. patent law, U.S. trademark law, discovery by U.S. courts and agencies, U.S. trading relations with state-controlled economy countries, U.S. First Amendment law, U.S. law and practices with respect to judgments, sovereign immunity law, Food and Drug Administration law, and immigration law. In addition, the Registrant represented the principal in the case of Geisser v. United States. Further, the Registrant represented the principal as amicus curiae in the case of Allis-Chalmers Corp. v. Arnold.

Federation Suisse des Associations de Fabricants d'Horlogerie

The Registrant rendered advice on U.S. laws, regulations and policies concerning watch imports and statistics, Harmonized Commodity Code, trademarks, and U.S. trading relations with state-controlled economy countries.

Lawrence Sunderland

Mr. Sunderland provided consulting services to the Registrant concerning economic and statistical matters regarding watch imports and trade, multilateral trade negotiations, tariff simplification, Harmonized Commodity Code, and economic and statistical matters regarding vegetable imports.

Union Nacional de Productores de Hortalizas

The Registrant represented the principal in connection with an antidumping investigation conducted by the Treasury

Attachment No. 4 Page Two

Department concerning certain fresh winter vegetables from Mexico. The Registrant also rendered advice and had discussions with members of Congress and their staffs concerning possible amendments to the Antidumping Act with respect to its application to perishable produce.

The London Commodity Exchange Co., Ltd., and International Commodities Clearing House, Ltd.

The Registrant rendered advice on U.S. laws, regulations and policies concerning commodity options trading in the United States, inclusion of London commodity options in the Part B regulatory program under consideration by the Commodity Futures Trading Commission, the ability of U.S. commercial interests to buy and sell options on the London markets, reporting requirements in the United States for foreign brokers and traders, brokerage commissions earned by U.S. futures commissions merchants, market stabilization activities by Latin American coffee producers, and proposed requirements for appointment of an agent for service of process by foreign brokers and traders.

Embassy of the Government of Israel

The Registrant rendered advice on U.S. laws in connection with United States supply of oil.

Kawasaki Heavy Industries, Ltd.

The Registrant rendered advice and represented the principal before the Office of Munitions Control in connection with a proceeding to obtain approval for the sale to Libya of certain Rescue/First Aid helicopters manufactured by the principal.

Asociacion de Fabricantes de Productores Quimicos

The Registrant rendered advice and had discussions with public officials concerning possible extension of the Generalized System of Preferences to Venezuela.

Government of the Republic of Panama

The Registrant rendered advice concerning legislation being considered by the U.S. Congress to implement the Panama Canal Treaty of 1977, arrangements for the visit of President Aristedes Royo of Panama to the United States, and a Report of the U.S. Embassy in Panama on Panama's national debt.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below? Yes _x_ No ____

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Union Nacional de Productores de Hortalizas

On behalf of the foreign principal, the Registrant was in contact concerning the possible application of the Antidumping Act of 1921 to perishable produce from Mexico with Richard Grimm and Alexander Sierck of the Department of Justice; Congressman Morris Udall; Congressman Fred Richmond; Congressman James Scheuer; Gene Friedman, Jason Cooke, Frank Getlein, Susan Safer, Charles Thompson, Charles Montford, James Feltham, William Vaughan, Donna Chmielewski, William Crist, Harry Lamar, Grace Kagun, Arthur Stein, Jan Archibald, Pat Eveland, Cary Dumbaugh, Joseph Crapa, Mabel Baker, John Martin, Phil Steele, and John Chester of the U.S. House of Representatives staff; Senator George McGovern; Robert Dockery, Jacques Gorlin, Robert Russell, Beth Gill, Jack Alberton, Steve Ward, Hardy Weideman, Robert Cassidy, Tom Sussman, Chip Rowe, Van Boyett, Larry Groner, Sturge Sobin, Terry Emerson, Mary Lou Campbell, and Henry Banta of the U.S. Senate staff; Robert Pastor, Guy Erb, and Richard Brown of the National Security Council; Janina Slattery, Charles Bloom, Jeff Cunningham, Ernest Johnson, Richard Cooper, Steve Rogers, Jules Katz, Mr. Wilcox, and Stuart Benson of the U.S. Department of State; Moe Rodenstein of the General Accounting Office; Steven Heimstra and Terry Crawford of the Council on Wage and Price Stability; Barbara Schlei, Charles Brady, Donald Zalowski, and Ed Billing of the U.S. Department of Agriculture; Alan Wolff, Susan Schwab, Jim Starkey, Mike Gadbar, and Steven Lande of the Office of Special Representative for Trade Negotiations; Dennis Clift, Lynn Daft, Dennis Rapp, Thomas Early, Esther Peterson, Al From, and David Johnson of the Executive Office of the President; Frank Vukmanik and John Ray of the U.S. Department of Treasury. The reason for such contacts was to discuss the status and issues involved in the antidumping matter and to urge amendment of the Antidumping Act with respect to perishable produce. Registrant also

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presented testimony before the Trade Subcommittee of the House Ways and Means Committee in support of an amendment to the Antidumping Act.

The London Commodity Exchange Co., Ltd., and International Commodities Clearing House, Ltd.

On behalf of the principal, the Registrant had discussions concerning U.S. trading in London options with James Stone, Chairman of the Commodities Futures Trading Commission; Hugh Cadden of the CFTC; Donald Tendick of the CFTC; Steven E. Storch, a Senate staff person; William E. Seale, a Senate staff person; Senator Patrick J. Leahy and his staff; Congressman Thomas S. Foley and his staff; Gary Seevers of the CFTC; Fred Spindel of the CFTC; Jack Gaine of the CFTC; Vernon Pherson of the CFTC; Vince Morgan of the CFTC; and Mark N. Rae of the CFTC. The Registrant sent a memorandum on this matter to the CFTC. The Registrant also sent a memorandum on this matter to certain members of Congress. The reason for such contacts was to urge that U.S. trading in London options should be permitted. The Registrant had discussions concerning the ability of U.S. commercial interests to buy and sell on the London markets with Gary Seevers and Mark N. Rae of the CFTC. The Registrant also was in contact with Deputy Assistant Secretary of State Bosworth with respect to alleged market stabilization activities by Latin American coffee producers.

Kawaski Heavy Industries, Ltd.

On behalf of the principal, the Registrant had discussions concerning approval for the sale to Libya of certain Rescue/First Aid helicopters manufactured by the principal with Col. Wolf P. Gross of the U.S. Department of State; James Bishop, Director of the Office of North African Affairs at the U.S. Department of State; Andrew Andronovich of the Office of Munitions Control at the U.S. Department of State; Allan Roy, the Libyan Desk Officer at the U.S. Department of State; and John D. Forbes and Richard L. Jackson at the U.S. Department of State. The reason for these contacts was to obtain approval from the Office of Munitions Control for the sale to Libya of certain Rescue/First Aid helicopters manufactured by the principal.

Asociacion de Fabricantes de Productores Quimicos

On behalf of the principal, the Registrant had discussions concerning possible extension of the Generalized

Attachment No. 5 Page Three

System of Preferences to Venezuela with Sally Shelton of the U.S. Department of State; Steve Ward of the U.S. Senate staff; Jim Dyke and Dennis Clift of the Executive Office of the President; and Harry Lamar of the U.S. House of Representatives staff.

Government of the Republic of Panama

On behalf of the principal, the Registrant had discussions concerning a Report of the U.S. Embassy in Panama on Panama's national debt with James C. Haahr, Director of Panamanian Affairs at the U.S. Department of State.

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14.(a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes x No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

Date	From Whom	Purpose	Amount			
Ambassador of the Swiss Confederation						
12/22/78 12/22/78 3/23/79 3/23/79	Swiss Embassy Swiss Embassy Swiss Embassy Swiss Embassy	Legal Fees Disbursements Legal Fees Disbursements	\$ 6,250.00 140.61 6,250.00 16.93			
	isse des Associations s d'Horlogerie					
1/5/79 1/5/79 3/20/79 3/20/79	Federation Suisse Federation Suisse Federation Suisse Federation Suisse	Legal Fees Disbursements Legal Fees Disbursements	\$ 6,250.00 302.50 6,250.00 1.65			
Union Naciona	l de Productores de Ho	rtalizas				
12/22/78	West Mexico Vegetable Distributors	Legal Fees	\$ 14,527.82			
12/22/78	West Mexico Vegetable Distributors	Disbursements	6,825.90			
12/29/78 1/5/79	West Mexico Vegetable Distributors Union Nacional	Legal Fees Legal Fees	21,353.72 9,500.00			
1/5/79 1/19/79	Union Nacional West Mexico Vegetable	Disbursements	2,618.46			
2/9/79	Distributors West Mexico Vegetable	Legal Fees	12,118.46			
2/9/79	Distributors West Mexico Vegetable	Legal Fees	13,150.00			
2/9/79	Distributors Union Nacional	Disbursements Legal Fees	2,118.12 13,150.00			

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Date	From Whom	Purpose	Amount
2/9/79	Union Nacional	Disbursements	\$ 2,118.12
3/23/79	West Mexico Vegetable Distributors	Legal Fees	7,037.50
3/23/79	West Mexico Vegetable		
	Distributors	Disbursements	1,790.16
3/23/79	Union Nacional	Legal Fees	7,037.50
3/23/79	Union Nacional	Disbursements	1,790.16
4/27/79	West Mexico Vegetable Distributors	Legal Fees	20,587.50
4/27/79	West Mexico Vegetable	20902 2002	
4/21/10	Distributors	Disbursements	2,492.40
4/27/79	Union Nacional	Legal Fees	20,587.50
4/27/79	Union Nacional	Disbursements	2,492.40
			·
Kawaski Heavy	Industries, Ltd.		
3/23/79	Kawaski	Legal Fees	\$ 11,500.00
3/23/79	Kawaski	Disbursements	213.41
5/18/79	Kawaski	Legal Fees	4,000.00
5/18/79	Kawaski	Disbursements	53.94
6/1/79	Kawaski	Legal Fees	11,500.00
6/1/79	Kawaski	Disbursements	104.29
0/1//3			
	ity Exchange Co., Ltd. and		
International	Commodities Clearing House	, Ltd.	
10/15/70	London Commodity Exchange	Legal Fees	\$ 11,750.00
12/15/78 12/15/78	London Commodity Exchange	Disbursements	366.00
3/9/79	London Commodity Exchange	Legal Fees	7,430.00
3/9/79	London Commodity Exchange	Disbursements	537.75
3/9/19	London Commodity Exchange	Dispuisements	337113
Association F	rancaise des Banques		
12/8/78	Association Francaise	Legal Fees	\$ 18,200.02
12/8/78	Association Francaise	Disbursements	1,531.44
12/15/78	Association Francaise	Legal Fees	2,083.33
12/15/78	Association Francaise	Disbursements	240.02
1/19/79	Association Francaise	Legal Fees	4,283.33
1/19/79	Association Francaise	Disbursements	718.97
1/26/79	Association Francaise	Disbursements	387.50
2/2/79	Association Francaise	Disbursements	193.75
2/16/79	Association Francaise	Legal Fees	2,200.00
2/16/79	Association Francaise	Disbursements	672.70
3/2/79	Association Francaise	Disbursements	193.75
3/9/79	Association Francaise	Legal Fees	4,283.33
3/9/79	Association Francaise	Disbursements	912.72
			\$ 270,113.66

15.(a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes x No
- (2) transmitted monies to any such foreign principal?

 Yes ____ No _x

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose		Amount			
Federation S de Fabricant		·					
Various 5/15/79	Xerox Corporation A&P Employees	Duplicating Local Transportation	\$	8.15 3.90			
		Total	\$	12.05			
	Union, Inc. and Switze						
12/18/78 2/15/79 3/14/79	A&P Employees Commerce Census A&P Employees	Local Transportation One-year Subscription Cash Expense	\$	3.80 50.00 5.50			
		Total.	\$	59.30			
Ambassador of the Swiss Confederation							
Various	C&P Telephone	Telephone	\$	3.47			
Various	Xerox Corporation	Duplicating		44.15			
Various	A&P Employees	Local Transportation		54.25			
Various	A&P Employees	Cash Expense		28.50			
4/2/79 5/1/79	Lawrence Sunderland Sata Rikhy	Cash Expense Professional Services		4.90 80.00			
5/8/79	Lawrence Sunderland	Cash Expense		.50			
		Total	\$	215.77			

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Date	To Whom	Purpose	Amount			
Embassy of the Government of Israel						
Various Various Various	Xerox Corporation A&P Employees A&P Employees	Duplicating Local Transportation Cash Expense	\$ 49.20 32.30 5.50			
,		Total	\$ 87.00			
Association	Francaise des Banques					
Various	C&P Telephone	Telephone	\$ 207.35			
12/6/78	Xerox Corporation	Duplicating	.90			
		Total	\$ 208.25			
	nderland (Consultant Sem nnt's Other Clients)	rvices to Foreign Princi	pals			
1 /4 /70	Lawrence Sunderland	Cash Expense	\$ 13.43			
1/4/79 1/2/79	Lawrence Sunderland	Professional Services	1,875.00			
2/1/79	Lawrence Sunderland	Professional Services	1,875.00			
3/1/79	Lawrence Sunderland	Professional Services	1,875.00			
3/1//9	Lawrence Sunderland	Professional Services	3,125.00			
4/2/79	Lawrence Sunderland	Professional Services	2,083.33			
4/2/79	Lawrence Sunderland	Local Transportation	2,000.00			
4/2/19	hawrence bunderrand	and Telephone	19.24			
5/1/79	Lawrence Sunderland	Professional Services	2,083.33			
5/8/79	Lawrence Sunderland	Local Transportation	_,,,,,,,			
3/0/13	Dawrence bunderrand	and Cash Expense	21.04			
6/1/79	Lawrence Sunderland	Professional Services	2,083.33			
07.47.73	14,101100 Dalla Dalla					
		Total	\$ 15,053.70			
Union Nacional de Productores de Hortalizas						
Various	Paul S. Reichler	Travel	\$ 1,018.88			
Various	A&P Employees	Local Transportation	784.90			
Various	A&P Employees	Cash Expense	206.52			
Various	Xerox Corporation	Duplicating	4,803.94			
1/30/79	Int'l Translation					
	Center	Translating	890.00			
Various	RCA Global Communi-					
	cations	Telexes	103.22			
Various	Lawrence Sunderland	Cash Expense	29.58			
1/3/79	Washington Hilton	Lodging	54.00			

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Page Three

Date	To Whom	Purpose		Amount
Various	Patrick F. J. Macrory	Travel Expense	\$	594.95
Various	Paul S. Reichler	Travel Expense		127.78
Various	Sati Rikhy	Professional Services		1,968.00
12/20/78	K. G. Elzinga	Professional Services		957.00
Various	U. S. Postal Service	Postage		45.44
Various	Dr. Robert Firch	Professional Services		875.00
2/14/79	Ft. Lauderdale Sun	Publication		3.50
Various	Tyler Business Service	Color Duplicating		251.79
Various	Western Union	Telegrams		155.19
3/14/79	Treasurer of the U.S.	FOIA Search		90.70
3/23/79	C. R. Mann	Professional Services		2,895.14
3/26/79	Harry Stuart/Al Yamada			230.00
Various	Executive World Travel	Travel		1,335.55
4/17/79	C. R. Mann	Professional Services		7,666.86
Various	Florida Clipping Serv.	Clipping Service		85.25
5/15/79	USDA - AMS	Duplicating		56.00
5/30/79	Sprint Package	Air Courier		66.50
5/22/79	IRS	Forms		1.60
5/20/79	Robert E. Herzstein	Travel Expense		480.00
Various	C&P Telephone	Telephone		123.48
5/31/79	R. L. Simmons	Professional Services	_	1,350.00
		Total	\$	27,250.77
Government	of the Republic of Panama	<u>a</u>		
Various	Xerox Corporation	Duplicating	\$	125.85
Various	A&P Employees	Local Transportation	•	21.70
Various	A&P Employees	Cash Expense		34.34
5/15/79	Executive World Travel	-	ets	349.00
5/30/79	William D. Rogers	Panama City Cash Expen		82.60
	-			
		Total	\$	613.49
	modity Exchange Co., Ltd.			
Internation	nal Commodities Clearing I	House, Ltd.		
Various	U.S. Postal Service	Postage	\$	4.56
Various	Xerox Corporation	Duplicating	'	282.10
Various	A&P Employees	Local Transportation		55.40
Various	A&P Employees	Cash Expense		129.16
2/13/79	Robert E. Herzstein	Cash Expense		166.92
Various	C&P Telephone	Telephone		31.27
Various	RCA Global Communi-			U + V = (
	cations	Telexes		267.80
		m-4-3		027.03
		Total	\$	937.21

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<u>Date</u>	To Whom	Purpose		Amount		
Kawaski He	avy Industries					
Various	Xerox Corporation	Duplicating	\$]	L71.90		
Various	A&P Employees	Local Transportation		36.95		
Various	A&P Employees	Cash Expense		18.10		
12/6/78	Ronald B. Ravikoff	Cash Expense		9.50		
4/6/79	Thomas B. Wilner	Cash Expense		66.18		
5/17/79	William D. Rogers	Cash Expense	. 2	210.35		
Various	RCA Global Communi-	•				
	cations	Telexes]	72.24		
Various	Western Union	Telegrams		32.35		
Various	C&P Telephone	Telephone		7.90		
Various	U.S. Postal Service	Postage		4.36		
5/8/79	Admiral Limousine	Limousine Service	3	340.00		
5/8/79	Wilson Gill, Inc.	Projector Rental		90.30		
		Total	\$ 1,1	160.13		
Asociacion de Fabricantes de Productores Quimicos						
3/29/79	Xerox Corporation	Duplicating	\$	2.70		
		Total	\$	2.70		

TOTAL \$ 45,600.37

September 1

ATTACHMENT 8

15.(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No x

If yes, furnish the following information:

* However, the following persons who have filed short form registration statements have made political contributions:

Date		nount or ng of Value	Name of Political Organization	Name of Candidate		
Paul S. Berg	<u>er</u>					
3/2/79	\$	100.00	Hooray for Harry Hughes Committee	Harry Hughes		
4/10/79		250.00	Idaho for Church Com- mittee	Frank Church		
5/2/79		500.00	Democratic Congressio- nal Dinner Committee	Unknown		
5/14/79		25.00	Citizens for Davis	Lanny Davis		
Brooksley La	ndau					
3/19/79	\$	15.00	Vickery for Senate Committee	Ray Vickery		
Daniel M. Lewis						
1/3/79	\$	25.00	Mike Barnes for Congress	Mike Barnes		
Nancy K. Min	Nancy K. Mintz					
4/13/79	\$	25.00	Egge for Supervisor Committee	T. Farrell Egge		

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UNITED STATES DEPARTMENT OF JUSTICE REGISTRATION UNIT CRIMINAL DIVISION WASHINGTON, D. C. 20530

BEPARTHENT OF JUSTICE

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REGISTRATION UNIT INTERNAL SECURITY SECTION CRIMINAL DIVISION

NOTICE

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2.		disseminate stration:	any material in	connection w	ith your
	Yes _		or No		·
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Robert E. Herzstein

Signature

Please type or print name of signatory on the line above

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Date